

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DISTRICT

ADELA BAI, on behalf of itself and all others
similarly situated,

Plaintiff,

v.

TOGO INTERNATIONAL HOLDINGS LTD.,
KAREL ROBERT DEN DAAS, ELLIS YAN, and
BRIAN CATLETT,

Defendants.

Case No. 1: 16-cv-00102

Judge Donald C. Nugent

**NOTICE OF CO-LEAD COUNSEL'S MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION EXPENSES**

TO: All Counsel of Record

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 23(e) and 23(h) and this Court's Order Preliminarily Approving the Settlement, Directing the Issuance of Notice, and Scheduling a Final Approval Hearing dated July 28, 2017 and upon (i) the Joint Declaration of Leigh Handelman Smollar and Adam M. Apton in Support of: (A) Motion for An Order Granting Final Approval of Class Action Settlement and Directing Dissemination of Notice to the Class and (B) Motion in Support of Attorneys' Fees, Reimbursement of Expenses and Reimbursement Award to Lead Plaintiffs; (ii) the Declarations of Leigh Handelman Smollar, Adam M. Apton, Sarah Evans, Michael Rivkind, Adela Bai, and Roland Willis; (iii) the Memorandum of Law in Support of Co-Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses; and (iv) all other papers and proceedings herein, Co-